



Natural Area Guardians
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GUARDIAN MISSION: *To promote understanding of natural resource issues and sound environmental practices, to help identify and protect natural areas, and to create and facilitate programs aimed at preserving native habitat.*

Upper Mississippi River NW&FR
CCP Comment Room 101
51 East Fourth Street
Winona, Wisconsin 55987

August 30, 2005

Dear Sirs:

Please find enclosed our comments on the "Draft Environmental Impact Statement for the Upper Mississippi River National Wildlife and Fish Refuge Comprehensive Conservation Plan" as published by the U.S. Fish & Wildlife Service in May 2005.

The Natural Area Guardians of Jo Daviess County in northwest Illinois is the volunteer group for the Soil and Water Conservation District. We have over 400 members in our chapter, many of whom are retired transplants from metropolitan Chicago. We know that there are many others who, in the next twenty years, are going to be moving to retirement communities up and down the River. If this demographic change and its impact along areas adjacent to the River are not considered in your planning, the effect on the River could be detrimental.

We are especially concerned that the natural landscape be protected, that the migratory flyway not only be protected but enhanced, and that the low-impact recreational and educational needs of residents and tourists be made available.

We have met with Ed Britton, who can't be complimented enough for his work, a number of times and we know how hard all of you are working. We are pleased to be involved in the planning process.

Sincerely,


Chuck Wemstrom
Chair

Comments Concerning

The

Draft Environmental Impact Statement for the
Upper Mississippi River National Wildlife and Fish Refuge
Comprehensive Conservation Plan

USFWS, May 2005

By

The Natural Area Guardians

Chuck Wemstrom, Chair
August, 2005

Alternative Components Not Considered

Approved Refuge Boundary

We agree that expansion of the approved refuge boundary need not be considered at this time. Nonetheless, a thorough reevaluation of that boundary is necessary to address ongoing changes to the greater refuge environment.

Strategic acquisitions to protect additional types of related habitats need to be made in the surrounding uplands. We also question whether the current refuge can be sustained without directly addressing problems associated with tributary streams that now enter the refuge.

Research Natural Areas

We agree that no area of the refuge would qualify for wilderness status. However, we strongly recommend that the oak savannas of the Lost Mound Unit be designated a Research Natural Area.

Fish & Turtle Sanctuaries

Lack of local information is not a reasonable basis for dismissing fish or turtle sanctuaries. There is ample evidence, from around the world, that sanctuaries are very effective in protecting these species and, more importantly, the habitats they require.

We further suggest that whether recreational fishermen can find sufficient numbers of bass is not a reasonable metric of "need" for such sanctuaries. On a wildlife refuge the statutory need is for biodiversity and enduring ecological processes, not entertainment.

Non-Wildlife-Dependent Recreation

We agree that a ban on non-wildlife-dependent public use is not required. However, "more proactive management of these uses" is required, and to be sufficient must indeed be proactive and must actually be implemented.

This document's hesitation to apply remedies to the entire refuge, but rather to hide in the backwaters does not heighten our expectation that "more proactive management of these uses" will actually be implemented.

Comments on Issues

Bluffland Protection

We feel that in order to protect the system as a whole it really needs to be bigger. We commend your plans to acquire 1,000 acres a year. We feel that that is a minimum number. More attention needs to be focused on the tributary rivers flowing into the River and the surrounding uplands need additional protection.

We prefer Alternative B. Easements are more efficient for taxpayers and also more flexible for landowners. We worry the service will not have the resources to manage these easements and therefore recommend they be held by local area land trusts.

Special Designations

Alternative D would require that the service "facilitate preparation of a nomination package for designating the Refuge a 'Wetland of International Importance' in accordance with the Ramsar Convention."

We prefer Alternative D. We agree that a nomination is a good idea. We think it could be a valuable tool in helping to tell the Refuge story and hopefully down the road help generate more revenue to support the System.

Guiding Principles for Habitat Management Programs

Alternative D states that "the esthetics of projects, in the context of visual impacts to the landscape, should be considered in project design." Alternative B does not.

We prefer Alternative D. The "esthetics of projects" is important. We have to consider both the ecological and cultural. Sometimes the two will clash making your job harder, but there is no way around the constant struggle to make the two compatible.

Threatened and Endangered Species Management

Alternative D requires "increase education and outreach specifically targeting threatened and endangered species found on the Refuge." Alternative B does not.

We prefer Alternative D; we feel that every effort must be made at every opportunity to continue on going public education.

General Hunting

The alternatives differ in the minimum number of huntable acres (B with 175,485 acres, and D with 190,586 acres) and the number of new Administrative No Hunting Zones (B with two zones covering 3,731, and D with six zones covering 5,322 acres).

In addition, Alternative D requires that "no hunting should occur on the Refuge prior to September 1 of each year and all hunting should end March 15, except for spring wild turkey hunting." Alternative B does not.

We prefer Alternative D. Healthy environments require healthy predators. Given the long and certain absence of wolves from this valley, hunters are required. What is missing is a plan to aim them at species out of balance—such as whitetail deer.

Waterfowl Hunting Closed Areas

The alternatives differ in the number of new Closed Areas (B with 14 areas covering 15,901 acres, and D with 5 areas covering 791 acres). In addition, Alternate B makes a superior selection of areas to close.

Alternative B would close all such areas to "all entry and use from October 1 to the end of the duck season." Alternative D would similarly close 3 areas, but disallow only offshore fishing and motorized watercraft in the remainder.

We prefer Alternative B. Finding no ecological need for the current level of waterfowl predation, we welcome additional closed areas. What is missing is a plan to restore the extremely low, local populations of these same species. We are amazed that after spring migration ends, in general, there are so few ducks in the Savanna/Lost Mound area

Waterfowl Hunting Regulation

Alternative D states that "waterfowl hunting parties shall maintain at least 100 yards spacing between each other." Alternative B does not.

We prefer Alternative D. Hunting safety is obviously important. We wonder, however, why the spacing is not 200 yards as recommended by the refuge manual.

Permanent Blinds

Alternative B would eliminate the use of permanent hunting blinds at the end of the 2006-2007 season. Alternative D would phase out the use of permanent blinds by the end of the 2008-2009 season.

We would prefer Alternative B; however it is probably a sensible compromise to wait two more years.

Managed Hunts

Alternative B would eliminate the Potter's Marsh managed hunt at the end of the 2006-2007 season. Alternative D would implement regulations to reduce the cost of administering that hunt. Both alternatives would eliminate the Blanding Landing managed hunt at the end of the 2006-2007 season.

We prefer Alternative B. Managed hunts are not an efficient use of refuge personnel.

General Fishing

Alternative B provides 104,716 acres to be open year-round for fishing plus an additional 38,645 acres to be closed to fishing only in the fall. Alternative D has 110,611 acres open year-round and an additional 32,750 acres closed only in the fall.

Alternative B maintains existing piers and docks. Alternative D would add 3 new ones.

We prefer Alternative B. What is missing here is a plan to protect spawning areas from human disturbance in the spring. Local populations of waterfowl would also benefit from spring closed areas.

Wildlife Observation and Photography

Alternative B maintains existing facilities for wildlife observation and photography.

Alternative D significantly improves and expands these facilities.

<u>Alternative</u>	<u>B</u>	<u>D</u>
Observation decks	15	26
Observation towers	0	3
Photographic blinds	0	3
Auto tour routes	1	3
Biking trails	3	5
Canoe trails	4	21
Hiking trails	8	16

We are very excited about Alternative D. We strongly recommend that not only is Alternative D followed but that this part of the plan be front loaded and the facilities be built sooner rather than later.

Interpretation and Environmental Education

Alternative B maintains existing facilities and programs for environmental education. Alternative D adds 24 new interpretive signs, new visitor contact facilities at McGregor, Winona, La Crosse, and Lost Mound, and establishes a minimum of one major education program for each district.

Alternative D hires a visitor services specialist for McGregor, Winona, and the National Mississippi River Museum in Dubuque. Alternative B does not.

We prefer Alternative D. Again trying to meet the sometimes conflicting needs of the Refuge will always be difficult. The Guardians want to see as many new resource management hires as possible and at the same time we want to see staff levels for education and compatible recreation personnel increase as well.

Commercial Fish Floats

Alternative B would eliminate commercial fishing floats and piers. Alternative D would develop new standards for these operations and retain those which comply.

We prefer Alternative D. Equitable access to refuge resources is important. We assume these new standards will be clear, concise, and easily enforceable.

Guiding Services

Alternative B would eliminate commercial guiding on the refuge. Alternative D would establish a process for issuing permits to regulate commercial guiding.

We prefer Alternative D. Equitable access to refuge resources is important. Again, the rules must be clear, concise, and easily enforceable.

Beach Use and Maintenance

Both alternatives allow beach-related activities in roughly the same areas. Alternative B proposes a closed-unless-open policy. Alternative D uses an open-unless-closed policy.

Alternative D would allow beach maintenance on spoil islands and existing dredge deposition sites adjacent to the main channel which are not otherwise restricted or closed to use. Alternative B would not.

We prefer Alternative B. Physical alteration of the refuge in support of non-wildlife related activities is not appropriate and would set a bad precedent. The closed-unless-open policy would, hopefully, require less signage.

Electric Motor Areas

Alternative B establishes 10 electric motor areas covering 15,900 acres. Alternative D establishes 16 such areas covering 14,498 acres. Alternative D would allow primitive camping in these areas. Alternative B would not.

We prefer Alternative B. Fewer, larger electric motor areas is preferable. Camping is not compatible with the broader purpose for these areas. It might seem to be OK now, but with a growing population using the Refuge camping outside areas set aside for camping just won't work.

Dog Use Policy

Alternative B would disallow the presence of unrestrained domestic animals except during authorized hunting activities. Alternative D would further allow unrestrained domestic animals at least 100 yards distant from facilities and other users.

We prefer Alternative B. Allowing the presence of pets on a leash is generous and sufficient. Just one child mauled by a pit bull would prove this to all. Why wait?

Office and Shop Facilities

Alternative B would replace three shop facilities. Alternative D would construct nine new offices and shops and expand one office. Alternative D would integrate the refuge headquarters into Winona or La Crosse.

We would like to see some of this construction money used for a visitor/learning center at Lost Mound.

Public Access Facilities

Alternative B maintains and modernizes existing public access facilities. In addition, Alternative D constructs numerous new facilities.

We prefer Alternative D. However the Guardians feel a visitor center should be a priority on the System's construction to do list.

Public Information and Awareness

Alternative B reduces special events and media contacts, and maintains the 63 existing information kiosks. Alternative D would increase special events and media contacts, and install 45 additional kiosks.

We prefer Alternative D. The Guardians are aware that the public could ruin the Refuge through excessive use. However we do feel that the kiosks are an important educational tool that can help people both enjoy the Refuge and use it in a way which is compatible with Refuge protection.

Staffing Needs

Alternative B would increase personnel from 37 or 54.5 FTE, with an emphasis on resource management. Alternative D would increase personnel from 37 to 56.5 FTE, with an added emphasis on customer service.

We want both! Alternative B and D. We know that this is impossible. However we can't pick between a biologist and a docent or vice versa. We need both-both are equally important.

Recommendations

The Natural Area Guardians recommend that this Comprehensive Conservation Plan:

1. Select Alternative D as the preferred alternative.
2. Make a clear, bold commitment to the ecological restoration of refuge lands, but at the same time make an equally strong commitment to education, the human use and enjoyment of the Refuge.
3. Proceed with the expansion of user facilities and work to meet basic refuge needs at the same time. Partnering with other agencies and non-profits establish a visitor/learning center at the Lost Mound Unit.
4. Implement a private lands conservation program for the uplands and work to protect the tributary rivers. At Lost Mound some important areas were given to the LRA and not to the USF&W Service. Work to acquire those critical areas.
5. Proactively work with visitors to ensure that their visits are compatible with wildlife management and habitat protection. And work to expand the Refuge so it can absorb the impact of more visitors and more visits.
6. Work with the states to reduce local populations of whitetail deer.
7. Create spring closed areas to protect spawning fish and local waterfowl.
8. Create a Research Natural Area for the oak savannas of Lost Mound.
9. Require all user regulations to be clear, concise, and easy to administer.
10. Eliminate managed hunts in favor of more flexible hunting regulations.
11. Focus outreach activities on habitats rather than species.